

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

BeeQB, LLC

Plaintiff,

v.

BLOCKQUARRY CORP. f/k/a ISW
HOLDINGS, INC., a Nevada corporation,
PANTHEON RESOURCES, INC., and
HYLMEN, LLC,

Defendants.

CIVIL ACTION NO. 7:24-CV-03179-TMC

**DEFENDANT HYLMEN, LLC'S
RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES**

Defendant Hylmen, LLC ("Hylmen") hereby responds to the Local Rule 26.01 Interrogatories as follows:

INTERROGATORY (A): State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: Hylmen is not aware of any person or legal entity with a subrogation interest in this action.

INTERROGATORY (B): As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: In the Complaint, Plaintiff has demanded a jury trial for its claims.

INTERROGATORY (C): State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned

company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Hylmen is a privately held limited liability company.

INTERROGATORY (D): State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: The United States District Court for the District of South Carolina, Spartanburg Division is a proper division for this action pursuant to the FRCP and applicable Local Rules. Pursuant to 28 U.S.C. §1404(a), Hylmen submits that the matter may also be proper in the Western District of Missouri, Southern Division.

INTERROGATORY (E): Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Yes, 7:24-cv-04911, *Crypto Infinity, LLC v. Blockquarry Corp., et. al.*, District of South Carolina.

6:24-cv-03183, *Bitmain Technologies Georgia Limited v. Hylmen, LLC, et. al.*, Western District of Missouri.

INTERROGATORY (F): If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: N/A as to Hylmen.

INTERROGATORY (G): If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Co-Defendant Blockquarry.

INTERROGATORY (H): *Parties or Intervenorors in a Diversity Case*. In an action in which jurisdiction is based on diversity under 28 U.S.C. §1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under §1332(a).

RESPONSE: Hylmen’s physical operations are currently conducted in the State of Missouri with management team spread out over numerous states within the United States.

This 15th day of November, 2024.

Respectfully submitted,

/s/ Trent M. Grissom

Trent M. Grissom (Fed. Bar No. 10671)

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Attorney for Defendant Hylmen, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2024, I caused the foregoing Defendant Hylmen, LLC's Responses to Local Rule 26.01 Interrogatories to be filed via CM/ECF which will provide notice of its filing to:

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